

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

In re: THE FINANCIAL OVERSIGHT AND MANAGEMENT BOARD FOR PUERTO RICO, as representative of THE COMMONWEALTH OF PUERTO RICO, <u>et al.</u> Debtors. ¹	PROMESA Title III Case No. 17 BK 3283-LTS (Jointly Administered)
In re: THE FINANCIAL OVERSIGHT AND MANAGEMENT BOARD FOR PUERTO RICO as representative of PUERTO RICO ELECTRIC POWER AUTHORITY, Debtor.	PROMESA Title III Case No. 17 BK 4780-LTS Re: ECF Nos. 16820, 16833, 16950, 16952, 17169, 17170 and 17403 in Case No. 17 BK 3283-LTS and ECF Nos. 2498, 2499, 2517, 2521, 2533, 2534 and 2558 in Case No. 17 BK 4780-LTS This Motion Relates Only to PREPA and Shall Only Be Filed in Case No. 17 BK 4780-LTS

**MOTION OF PREPA FOR LEAVE TO CITE SPANISH-LANGUAGE CASE LAW
AND FOR EXTENSION OF TIME TO FILE CERTIFIED TRANSLATIONS**

¹ The Debtors in these Title III Cases, along with each Debtor's respective Title III case number and the last four (4) digits of each Debtor's federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17 BK 3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation ("COFINA") (Bankruptcy Case No. 17 BK 3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority ("HTA") (Bankruptcy Case No. 17 BK 3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico ("ERS") (Bankruptcy Case No. 17 BK 3566-LTS) (Last Four Digits of Federal Tax ID: 9686); (v) Puerto Rico Electric Power Authority ("PREPA") (Bankruptcy Case No. 17 BK 4780-LTS) (Last Four Digits of Federal Tax ID: 3747); and (vi) Puerto Rico Public Buildings Authority ("PBA") (Bankruptcy Case No. 19-BK-5233-LTS) (Last Four Digits of Federal Tax ID: 3801). (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations.)

COMES NOW, the Puerto Rico Electric Power Authority², by and through the undersigned counsel, and respectfully states and prays as follows:

1. Today, the Puerto Rico Electric Power Authority (PREPA) filed *PREPA's Opposition to Verified Motion of Foreman Electric Services Inc. for Allowance of Administrative Expense Claim* (the "Opposition") (ECF No. 17403)³

2. In support of the arguments raised in the Opposition, PREPA cited the following authority:

- a. *Alco Corp. v. Mun. de Toa Alta*, 183 D.P.R. 530, 552 (2011)
- b. *Colón-Colón v. Mun. de Arecibo*, 170 D.P.R. 718, 728–729 (2007)
- c. *Genesis Security Services, Inc. v. Departamento del Trabajo y Recursos Humanos*, 204 D.P.R. 986, 997-989 (2015)
- d. *Mun. of Quebradillas v. Corp. Salud Lares*, 180 D.P.R. 1003 (2011)
- e. *Ortiz v. Guayama Municipality*, 163 D.P.R. 208 (2004)
- f. *Quest Diagnostics v. Mun. San Juan*, 175 D.P.R. 994 (2009)
- g. *Rodríguez-Ramos v. ELA*, 190 D.P.R. 448 (2014)

3. The above-listed cases are available on Westlaw in its original Spanish language (the "Spanish-Language Case Law"). Due to time constraints, despite diligent efforts, PREPA was unable to obtain certified English-language translations of the Spanish-Language Case Law from their original Spanish language prior to today's filing. Accordingly, PREPA seeks leave from this Court to rely on Spanish-Language Case Law in its original Spanish language and requests an extension of seventeen (17) days, to and including August 2, 2021, to file a certified English-language translation of the Spanish-Language Case Law pursuant to Local District Rule 5(g).

² The Financial Oversight and Management Board for Puerto Rico, as PREPA's representative pursuant to section 315(b) of the *Puerto Rico Oversight, Management, and Economic Stability Act*, has authorized PREPA to file this motion on its behalf.

³ References to Case No. 17-03283-LTS.

WHEREFORE, PREPA respectfully requests the Court to enter the Proposed Order, attached hereto as Exhibit A, permitting it to cite Spanish-Language Case Law in their original Spanish language, granting until August 2, 2021, to submit a certified English-language translation of the Spanish-Language Case Law, and granting such other and further relief as is just and proper.

Dated: July 16, 2021
San Juan, Puerto Rico

s/ *Katiuska Bolaños-Lugo*
Katiuska Bolaños-Lugo
USDC-PR No. 231812
kbolanos@diazvaz.law

DÍAZ & VÁZQUEZ LAW FIRM, P.S.C
290 Jesús T. Piñero Ave.
Oriental Tower, Suite 803
San Juan, PR 00918
Tel.: (787) 395-7133
Fax: (787) 497-9664

EXHIBIT A

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

In re:

THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD FOR PUERTO
RICO,

as representative of

THE COMMONWEALTH OF PUERTO
RICO, et al.

Debtors.¹

PROMESA
Title III

Case No. 17 BK 3283-LTS

(Jointly Administered)

In re:

THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD FOR PUERTO
RICO

as representative of

PUERTO RICO ELECTRIC POWER
AUTHORITY,

Debtor.

PROMESA
Title III

Case No. 17 BK 4780-LTS

Re: ECF Nos. 16820, 16833, 16950, 16952,
17169, 17170, and 17403 in Case No. 17 BK
3283-LTS and ECF Nos. 2498, 2499, 2517,
2521, 2533, 2534, and 2558 in Case No. 17
BK 4780-LTS

**This Motion Relates Only to PREPA and
Shall Only Be Filed in Case No. 17 BK
4780-LTS**

**[PROPOSED] ORDER ON MOTION OF PREPA FOR LEAVE TO CITE
SPANISH-LANGUAGE CASE LAW AND FOR EXTENSION
OF TIME TO FILE CERTIFIED TRANSLATIONS**

¹ The Debtors in these Title III Cases, along with each Debtor's respective Title III case number and the last four (4) digits of each Debtor's federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17 BK 3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation ("COFINA") (Bankruptcy Case No. 17 BK 3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority ("HTA") (Bankruptcy Case No. 17 BK 3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico ("ERS") (Bankruptcy Case No. 17 BK 3566-LTS) (Last Four Digits of Federal Tax ID: 9686); (v) Puerto Rico Electric Power Authority ("PREPA") (Bankruptcy Case No. 17 BK 4780-LTS) (Last Four Digits of Federal Tax ID: 3747); and (vi) Puerto Rico Public Buildings Authority ("PBA") (Bankruptcy Case No. 19-BK-5233-LTS) (Last Four Digits of Federal Tax ID: 3801). (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations.)

Upon consideration of the *Motion of PREPA for Leave to Rely on Spanish-Language Case Law and for Extension of Time to File a Certified Translation* (the “Motion”), filed by the Puerto Rico Electric Power Authority (PREPA), for an order granting PREPA leave to rely on a Spanish-language version of the Spanish-Language Case Law² and an extension of seventeen (17) days, to and including August 2, 2021, to file certified English-language translations of the Spanish-Language Case Law, as more fully set forth in the Motion; and the Court having jurisdiction to consider the Motion and to grant the relief requested therein pursuant to PROMESA section 306(a); and venue being proper pursuant to PROMESA section 307(a); and notice of the Motion being adequate and proper under the circumstances, and no other or further notice being required; and finding good cause for the requested relief, it is hereby ORDERED that:

1. The Motion is GRANTED as set forth herein.
2. PREPA is permitted to rely on the Spanish-language version of the Spanish-Language Case Law.
3. PREPA’s certified English-language translation of the Spanish-Language Case Law shall be due on or before August 2, 2021.

Dated: July __, 2021

LAURA TAYLOR SWAIN
UNITED STATES DISTRICT JUDGE

² Capitalized terms used but not otherwise defined herein have the meanings given to them in the Motion.